

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	Chapter 11
FRANCHISE GROUP, INC., <sup>1</sup>	Case No. 24-12480 (LSS)
Reorganized Debtor.	(Jointly Administered)
	<b>Hearing Date: November 18, 2025 at 10:00 a.m. (Eastern)</b>
	<b>Obj. Deadline: November 12, 2025 at 4:00 p.m. (Eastern)</b>

**NOTICE OF MOTION**

**PLEASE TAKE NOTICE** that Lawrence R. Hirsh, Litigation Trustee of the Litigation Trust, filed the attached *Motion for Entry of an Order (I) Extending the Time to File Notices of Removal of Related Proceedings, and (II) Granting Related Relief* (the “Motion”) with the United States Bankruptcy Court for the District of Delaware (the “Court”).

**PLEASE TAKE FURTHER NOTICE** that responses, if any, to the Motion, must be filed on or before **November 12, 2025 at 4:00 p.m. (ET)** (the “Objection Deadline”) with the Court, 824 North Market Street, 6<sup>th</sup> Floor, Wilmington, Delaware 19801. At the same time, you must serve a copy of the objection upon the undersigned counsel to the Litigation Trustee so as to be received on or before the Objection Deadline.

**PLEASE TAKE FURTHER NOTICE** that a hearing on the Motion will be held on **November 18 2025, at 10:00 a.m. (ET)** before the Honorable Laurie Selber Silverstein, United States Bankruptcy Judge, at the Bankruptcy Court, 824 Market Street, 6<sup>th</sup> Floor, Courtroom No. 2, Wilmington, Delaware 19801.

**PLEASE TAKE FURTHER NOTICE THAT IF NO OBJECTIONS TO THE MOTION ARE TIMELY FILED, SERVED, AND RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.**

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<sup>1</sup> The last four digits of Franchise Group, Inc.’s federal tax identification number are 1876. The mailing address for Franchise Group, Inc. is 2371 Liberty Way, Virginia Beach, Virginia 23456. In addition to the foregoing Reorganized Debtor, the “Reorganized Debtors” include certain affiliated entities, a complete list of which, including the last four digits of their federal tax identification numbers and addresses, may be obtained on the website of the Reorganized Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FRG/>. All motions, contested matters, and adversary proceedings that remained open as of the closing of such cases, or that are opened after the date thereof, are administered in the remaining chapter 11 case of Franchise Group, Inc., Case No. 24-12480 (LSS).

Dated: October 28, 2025  
Wilmington, Delaware

**RAINES FELDMAN LITTRELL LLP**

*/s/ Mark W. Eckard*  
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